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FILED

Sep 24, 2020

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

8
9 IN THE UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 KRISTY LYNN FELKINS,

15 Defendant.

CASE NO. 2:20-cr-0175 TLN

18 U.S.C. § 1958 – Murder-for-Hire; 18 U.S.C. §
981(a)(1)(C) and 28 U.S.C. § 2461(c) – Criminal
Forfeiture

17 I N D I C T M E N T

18 The Grand Jury charges: T H A T

19 KRISTY LYNN FELKINS,

20 defendant herein, between in or around February 2016, and continuing through in or around May 2016,
21 in the County of Butte, State and Eastern District of California, and elsewhere, did use the mail and a
22 facility of interstate commerce, to wit: the Internet and Bitcoin, with the intent that a murder be
23 committed in violation of the laws of the States of California and North Carolina, as consideration for
24 the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value, to
25 wit: Bitcoin, in violation of Title 18, United States Code, Section 1958.

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1 FORFEITURE ALLEGATION: [18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) - Criminal
2 Forfeiture]

3 1. Upon conviction of the offense alleged in this Indictment, defendant KRISTY LYNN
4 FELKINS shall forfeit to the United States, pursuant to Title 18, United States Code, Section
5 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), all property, real and personal, which
6 constitutes or is derived from proceeds traceable to such violation, including but not limited to:

7 a. A sum of money equal to the amount of proceeds traceable to such offense, for
8 which defendants are convicted.

9 2. If any property subject to forfeiture, as a result of the offense alleged in this Indictment,
10 for which defendant is convicted:

11 a. cannot be located upon the exercise of due diligence;

12 b. has been transferred or sold, or deposited with, a third party;

13 c. has been placed beyond the jurisdiction of the Court;

14 d. has been substantially diminished in value; or


15 e. has been commingled with other property which cannot be divided without
16 difficulty,

17 it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c),
18 incorporated by Title 21, United States Code, Section 853(p) and to seek forfeiture of any other property
19 of defendant, up to the value of the property subject to forfeiture.

20 A TRUE BILL.

21 **/s/ Signature on file w/AUSA**

22
23 FOREPERSON

24 
25 McGREGOR W. SCOTT
26 United States Attorney
27
28

No. _____

UNITED STATES DISTRICT COURT

Eastern District of California

Criminal Division

THE UNITED STATES OF AMERICA

vs.

KRISTY LYNN FELKINS

I N D I C T M E N T

VIOLATION(S):

18 U.S.C. § 1958 – Murder-for-Hire;
18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Criminal Forfeiture

A true bill,

/s/ Signature on file w/AUSA

Foreman.

Filed in open court this 24th day

of September, A.D. 20 20

/s/Valerie Callen

Clerk.

Bail, \$ _____

No process needed

am Clavin

United States v. Kristy Lynn Felkins
Penalties for Indictment

COUNT 1:

VIOLATION: 18 U.S.C. § 1958 – Murder-for-Hire

PENALTIES: Up to 10 years in prison; or
Fine of up to \$250,000; or both fine and imprisonment
Supervised release of up to 3 years

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

FORFEITURE ALLEGATION:

VIOLATION: 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) - Criminal Forfeiture

PENALTIES: As stated in the charging document